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April 25, 2024

VIA ECF

United States District Court
Eastern District of New York
Attn: Hon. Eric N. Vitaliano, U.S.D.J.
225 Cadman Plaza East
Courtroom 4C South
Brooklyn, NY 11201-1804

Re: Fidan, et ano. v. Istanbul Rego Park, Inc., et al.
Case No.: 1:22-cv-2252 (ENV) (SJB)

Dear Judge Vitaliano:

This firm represents the Defendants in this case, and respectfully submits this letter jointly with the Plaintiffs pursuant to III(B) of this Court's Individual Motion Practices and Rules to propose a briefing schedule for Defendants' anticipated motion to set aside the April 12, 2024 Order of the Hon. Sanket J. Bulsara, U.S.M.J. pursuant to Rule 72 of the Federal Rules of Civil Procedure (hereinafter referred to as "Rules" or "Rule").

The parties have consulted with each other and propose the following briefing schedule: (i) moving papers by tomorrow, April 26, 2024, which is the deadline to so move under Rule 72; (ii) Plaintiffs do not oppose and therefore do not seek a date by which to do so; and (iii) any date set by this Court to the extent there is any need for further briefing upon review of Defendants' moving papers.

To avoid a waiver of their rights, Defendants intend to file their notice of motion and memorandum of law in support no later than tomorrow. Defendants thank this Court for its time and attention to this case.

Dated: Jamaica, New York
April 25, 2024

Respectfully submitted,

SAGE LEGAL LLC

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